

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

UNIQUE FABRICATING, INC., *et al.*¹

Debtors.

Chapter 7

Case No. 23-11824 (KBO)

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), the undersigned counsel enter their appearance as Delaware counsel for Volkswagen Group of America Chattanooga Operations, LLC (“VW”) and request that all notices and other papers filed or served in the above-captioned cases be served upon the following attorneys:

Christopher M. Samis (No. 4909)
Sameen Rizvi (No. 6902)
POTTER ANDERSON & CORROON LLP
1313 N. Market Street, 6th Floor
Wilmington, Delaware 19801
Telephone: (302) 984-6000
Facsimile: (302) 658-1192
Email: csamis@potteranderson.com
srizvi@potteranderson.com

PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether

¹ The debtors in these cases, along with the last four digits of the federal tax identification number for each of the debtors, where applicable are: Unique Fabricating, Inc. (6791); Unique Fabricating NA, Inc. (8349); Unique Fabricating South, Inc. (9868); Unique-Prescottech, Inc. (9729); Unique-Chardan, Inc. (8350); Unique Molded Foam Technologies, Inc. (3749); Unique-Intasco USA, Inc. (8572); and Unique Fabricating Realty, LLC (N/A).

transmitted or conveyed by mail, delivery, telephone, electronic filing, facsimile, or otherwise filed or made with regard to the referenced case and proceedings herein.

PLEASE TAKE FURTHER NOTICE that filing of this *Notice of Appearance and Request for Notices* shall not be deemed or construed to constitute a waiver of any substantive or procedural right of VW including, without limitation: (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court; or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which VW is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until VW expressly states otherwise, VW does not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

[Remainder of Page Intentionally Left Blank]

Dated: November 14, 2023
Wilmington, Delaware

Respectfully submitted,

/s/ Christopher M. Samis

Christopher M. Samis (No. 4909)

Sameen Rizvi (No. 6902)

POTTER ANDERSON & CORROON LLP

1313 N. Market Street, 6th Floor

Wilmington, Delaware 19801-3700

Telephone: (302) 984-6000

Facsimile: (302) 658-1192

Email: csamis@potteranderson.com

srizvi@potteranderson.com

– and –

Ronald E. Gold, Esq.

Erin P. Severini, Esq.

FROST BROWN TODD LLP

Great American Tower

301 East Fourth Street, Suite 3300

Cincinnati, Ohio 45202

Telephone: (513) 651-6800

Facsimile: (513) 651-6981

Email: rgold@fbtlaw.com

eseverini@fbtlaw.com

– and –

Aaron T. Brogdon, Esq.

FROST BROWN TODD LLP

One Columbus Center

10 West Broad Street, Suite 2300

Columbus, Ohio 43215

Telephone: (614) 464-1211

Facsimile: (614) 464-1737

Email: abrogdon@fbtlaw.com

*Counsel to Volkswagen Group of America
Chattanooga, LLC*